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The Honorable Robert J. Bryan

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

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UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of all
those similarly situated,

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Plaintiffs,

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v.
THE GEO GROUP, INC., a Florida
corporation,

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Defendant.

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No. 3:17-cv-05769-RJB

DECLARATION OF JAMAL N.
WHITEHEAD IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTIONS IN
LIMINE

I, JAMAL N. WHITEHEAD, declare as follows:

1. I am over the age of eighteen, competent to testify in this matter, and do so

based on personal knowledge.

2. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' expert Jeffrey A.

Munson, Ph.D.'s amended report dated February 6, 2020.

3. Attached as Exhibit 2 is a true and correct copy of a letter from my law

partner Adam J. Berger to Defendant's counsel dated February 24, 2020, regarding the

production of Dr. Munson's amended report and GEO's late-production of certain financial

data.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 DATED at Seattle, Washington this 23rd day of March, 2020.
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5 *s/Jamal N. Whitehead*
6 JAMAL N. WHITEHEAD
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